

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

State of Washington
Plaintiff(s),

v.

The GEO Group, Inc.
Defendant(s).

Case No. 3:17-cv-05806-RJB

PRAECIPE

TO THE CLERK OF THE ABOVE-ENTITLED COURT:
You will please:

Substitute the attached brief for the one filed originally as ECF 152-3, Exhibit C to Declaration of Marsha Chien.

November 16, 2018

Dated

s/Marsha Chien

Sign or use an "s/" and your name

Marsha Chien, WSBA #47020
Assistant Attorney General
Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

Name, Address, and Phone Number of Counsel or Pro Se

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

November 16th, 2018

s/Caitilin Hall
Caitilin Hall, Legal Assistant

CHIEN DECLARATION
EXHIBIT C

NORTHWEST DETENTION CENTER

Pod Porter Job Descriptions

Prior to any detainee being assigned to a pod porter detail this form must be completed with the detainee initialing next to the corresponding job that closely represents the job they are being assigned to. This form along with the voluntary worker agreement form and a memo must be turned in before a detainee can be placed on the pod porter list and begin getting paid.

Server positions

Pod server1: Sanitize tables and benches before and after meals. Pick up meal cart from kitchen, hand out trays, stack trays after meal, clean the microwaves, counter, cabinets, sinks, and return meal cart to the kitchen. These duties are to be completed after every meal.

Detainee Initials _____

Pod server2: Sanitize tables and benches before and after meals. Hand out juice and fruit, sweep and mop floors around table area, and empty all pod trash cans. These duties are to be completed after every meal.

Detainee Initials _____

Pod porter positions

Showers: Clean the walls, floors, and curtains of the shower stalls. Wipe down all mirrors, clean air vents, sweep and mop the floor in front of stalls and replace shower soap. These duties are to be completed at least twice daily right after showers close and as needed.

Detainee Initials _____

Bathrooms: Clean all toilets and sinks inside and out. Clean the walls, air vents, sweep and mop the bathroom floor, and replace hand soap and toilet paper. Empty bathroom trash cans. These duties are to be completed as needed and during (2330-0130) pod clean up.

Detainee Initials _____

Pod clean up & Horseshoe/staff bathroom (2330-0130): Clean cabinets, sinks, microwaves, dayroom tables, windows, phones and empty dayroom trash cans. (In addition to: Level 1 & 2 units will sweep and mop horseshoe, hallway, and staff bathroom. Clean walls, windows, and doors in the horseshoe, hallway, and staff bathroom and restock staff bathroom.)

Detainee Initials _____

Pod clean up upper pod (2330-0130): Sweep and mop upper pod. Clean the stairs and rails which include sweeping, dusting and removing all dirt from the grates and between stairs and walls. Clean and straighten upper janitor closet making sure all mop buckets are empty, all supplies are neatly put away, and the floor is clean. (In addition to: Level 3 living units will clean cabinets, sinks, microwaves, dayroom tables, windows, phones and empty dayroom trash cans.)

Detainee Initials _____

NORTHWEST DETENTION CENTER

Pod Porter Job Descriptions

Pod clean up lower pod (2330-0130): Sweep and mop lower pod. Clean and straighten up janitor closet making sure all mop buckets are empty, all supplies are neatly put away, and the floor is clean.

Detainee Initials _____

Clean cells 106/107 and 114/115: Clean the toilet and sink inside and out, sweep and mop the floor, remove trash, keep the beds, walls, and slider clean, and replace hand soap and toilet paper. These duties are to be completed as needed and during (2330-0130) pod clean up.

Detainee Initials _____

Day shift pod clean up: Sweep and mop the floors, and clean the walls of the pod as needed, polishing table legs, benches, and bolts securing them to the floor as needed. Clean all cell door sliders and frames and other duties as assigned. These duties are to be completed during (0730-1530) and as needed.

Detainee Initials _____

Swing shift pod clean up/Rec Yard: Sweep and mop the floors, and clean the walls of the pod as needed, polishing table legs, benches, and bolts securing them to the floor as needed. Clean the recreation yard area which includes washing the walls and sweeping the floor, cleaning all rec yard windows as well as cleaning the doors, kick plates and door jams and other duties as assigned. These duties are to be completed during (1530-2330) and as needed.

Detainee Initials _____

Laundry: Ensure the dirty laundry bins are out in the horseshoe area for the laundry detail to pick up in the morning. Retrieve the laundry in the evening and pass out to the detainees in the pod. Keep book cart clean and organized, and put away pod supplies when they arrive. These duties and any other that pertain to laundry are to be completed daily and or as needed.

Detainee Initials _____

Print Detainee Name

A#

Pod

Detainee Signature

Date

Officer Signature